

UNITED STATES DISTRICT COURT
for the District of Massachusetts

MARVELL SEMICONDUCTOR, INC.,)	
Petitioner,)	
)	
v.)	CASE IPR2014-00553
)	
INTELLECTUAL VENTURES I, LLC,)	
Patent Owner)	

INTELLECTUAL VENTURES I, LLC'S
MOTION TO APPLY FOR DEPOSITION SUBPOENA

Now comes Patent Owner, Intellectual Ventures I, LLC ("Intellectual Ventures") and respectfully requests that the United States District Court for the District of Massachusetts issue a Subpoena to Testify at a Deposition in a Inter Partes Review regarding the instant matter to Ms. Paula Carey for a deposition to take place at Esquire Deposition Solutions, 99 Summer Street, Ste. 804, Boston, MA 02110. As grounds therefore, Intellectual Ventures states as follows:

1. The underlying case requiring Ms. Carney's deposition is pending in the United States Patent and Trademark Office, Case IPR2014-00553;
2. On or about April 14, 2015, the United States Patent and Trademark Office (Giannetti, J.) granted Intellectual Ventures an authorization to Apply for Subpoena from Federal District Court (See Order dated April 15, 2015, attached as Exhibit A).
3. Counsel for Intellectual Ventures, LLC, McAndrews, Held & Malloy, Ltd. is located in Chicago, IL and, as such, has retained the present local counsel, Barry Bachrach, Esquire to file the instant Motion to Apply for Deposition Subpoena.
4. The proposed deponent, Ms. Paula Carey, has relevant information concerning this case.
5. The allowance of this Motion will not prejudice any party in the instant matter.
6. The proposed Subpoena is attached.

WHEREFORE, Patent Owner, Intellectual Ventures, LLC, respectfully requests this Honorable Court to issue a Subpoena to Testify at a Deposition in a Inter Partes Review regarding the instant matter to Ms. Paula Carey for a deposition to take place at the Esquire Deposition Solutions, 99 Summer Street, Ste. 804, Boston, MA 02110.

Intellectual Ventures, LLC
By its attorney,

/s/ Barry A. Bachrach
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Date: 04/28/15

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of April 2015, I served a copy of the within Intellectual Ventures I, LLC's Motion to Apply for Deposition Subpoena, via first class mail, postage prepaid, to the following counsel of record:

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/s/ Barry A. Bachrach

EXHIBIT A

Trials@uspto.gov
571-272-7822

Paper 30
Entered: April 14, 2015

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MARVELL SEMICONDUCTOR, INC.,
Petitioner

v.

INTELLECTUAL VENTURES I LLC,
Patent Owner

Case IPR2014-00553
Patent No. 6,754,195

THOMAS L. GIANNETTI, *Administrative Patent Judge.*

ORDER

Authorization to Apply For Subpoena From Federal District Court
35 U.S.C. § 24; 37 C.F.R. § 42.52

IPR2014-00553
Patent 6,754,195 B2

On April 8, 2015, the Patent Trial and Appeal Board (“Board”) granted Patent Owner’s request to compel the deposition of PAULA CAREY, a non-party to this proceeding who executed a declaration on which Petitioner may rely. *See* Paper 28.

It is hereby,

ORDERED that Patent Owner is permitted under 35 U.S.C. § 24 to apply for a subpoena from the Clerk of the United States court for the district where testimony of PAULA CAREY is to be taken;

FURTHER ORDERED that Petitioner is permitted to attend the deposition and to conduct re-direct examination of the witness; and

FURTHER ORDERED that the deposition of the witness shall be limited to one hour of cross-examination by Patent Owner on the subject matter of the witness’s declaration and thirty minutes of re-direct examination by Petitioner limited to the scope of the cross-examination.

SO ORDERED.

Dated: April 15, 2015

/s/Thomas L. Giannetti

Thomas L. Giannetti
Administrative Patent Judge